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AUG 28 REC'D

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August 24, 2001

Deena Sheppard-Johnson  
Enforcement Specialist  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590



Re: Chemical Recovery Systems, Inc.  
Elyria, Ohio

Dear Ms. Sheppard-Johnson:

I am writing on behalf of Marconi Communications ("Marconi") in response to the special notice letter dated June 26, 2001 with respect to the above-referenced Site. Marconi apparently received the special notice because it is the current owner of a facility formerly owned by Lorain Products. While Marconi vigorously denies any liability with respect to the Site, in an effort to minimize transaction costs, it offers to contribute to response costs for the Site that are consistent with the National Contingency Plan and otherwise legally recoverable, provided that such contribution is proportional to the de minimis nature of its alleged involvement with the Site. Much less than one-tenth of one percent of the volume described on U.S. EPA's "dirty inventory list" is attributed to Lorain Products.

In a good faith effort to resolve its liability for the response action described in the special notice, Marconi has joined with other de minimis parties to offer a substantial settlement contribution to those large-volume PRPs who wish to actually perform the RI/FS. The company intends to continue to negotiate in good faith with those PRPs regarding such a settlement.

Please do not hesitate to contact me if you wish to discuss this matter in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Rego".

John A. Rego

cc: John Nadzan